REMARKS

The Office Action mailed September 19, 2006, and made final, has been carefully reviewed and the following remarks are made in consequence thereof.

Claims 1-20 are pending in this application. Claims 1-20 stand rejected. Claims 5, 8, 13, and 17 are objected to. Claims 1, 5, 8, 13, 17, 19, and 20 have been amended. No new matter has been added.

In accordance with 37 C.F.R. 1.136(a), a one month extension of time is submitted herewith to extend the due date of the response to the Office Action dated September 19, 2006, and made final, for the above-identified patent application from December 16, 2006, through and including January 16, 2007. In accordance with 37 C.F.R. 1.17(a)(3), authorization to charge a deposit account in the amount of $120.00 to cover this extension of time request also is submitted herewith.

The objection to Claims 5, 8, 13, and 17 is respectfully traversed.

Claim 5 has been amended to recite "said at least one class formats SQL statements and invokes requests to servlets in said server that provide database access." This recitation is described in the specification at page 3, line 18, for example. As such, Applicants respectfully request the objections to Claim 5 be withdrawn.

Claim 8 has been amended to recite "one of said tables stores families of parts to which an error proofing example applies." This recitation is described in the specification at page 5, line 4, for example. As such, Applicants respectfully request the objections to Claim 8 be withdrawn.

Claim 13 recites "an error proofing technique...." This recitation is described in the specification at page 1, lines 5-9, for example. Accordingly, Applicants respectfully submit that the recitation of an "error proofing technique" is an example of an error proofing methodology. However, Applicants respectfully submit that an error proofing methodology cannot fairly be equated with an error proofing document. Specifically, Applicants respectfully traverse the assertion on page 3 of the Office Action that the error proofing technique is interpreted as an 'error proofing document.'" Rather, the specification of the

current invention recites "a web based system that facilitates rapid and reliable documenting, cataloging, and distributing of proven error proofing techniques. . . . [The] system includes a web site that contains categorized error proofing techniques applicable to a broad range of design, manufacturing, assembly, product test, product service, and other processes" (See Specification, pg. 1, lines 15-20). Accordingly, in the current invention, an error proofing example is not necessarily an "error proofing document," but rather, is a technique applicable to a broad range of design, manufacturing, assembly, product test, product service, and other processes. Claim 13 has been amended to address the antecedent basis issues. For at least the reasons stated above, Applicants respectfully request the objections to Claim 13 be withdrawn.

Claim 17 has been amended to recite "formatting at least one SQL statement via at least one servlet providing access to database...." This recitation is described in the specification at page 3, line 18, for example. As such, Applicants respectfully request the objections to Claim 17 be withdrawn.

For the reasons set forth above, Applicants request that the objection to Claims 5, 8, 13, and 17 be withdrawn.

The rejection of Claims 1-20 under 35 U.S.C. § 103 as being unpatentable over Serbinis et al. (U.S. Pat. No. 6,584,466) (hereinafter "Serbinis") in view of Pretz (U.S. Pat. No. 6,014,658) (hereinafter "Pretz") is respectfully traversed.

Serbinis describes a system for managing electronic documents over the Internet that uses an Internet-accessible server programmed to provide document management services. The system includes a Document Management Services (DMS) database 25 that includes a plurality of tables 61-64 and 66-68 that maintain information on documents stored in store 30. The information in tables 61-64 and 66-68 includes document related information, user information, notification information, transaction information, and security information. Metadata, including information about the document itself, also is uploaded and stored in the document tables of DMS database 25. Notably, Serbinis does not describe nor suggest a user entering an error proofing example, a failure mode, or meta-data including at least one of an error stage and an error type in tables 61-64 and 66-68. Additionally, Serbinis does not describe nor suggest a database that includes an error proofing example or one failure mode associated with the error proofing example.

Pretz describes a computer-based system for facilitating exchange of information between a third party computer owner and a technical service representative where the computer owner calls the representative for help with their computer. The system has a database including a plurality of records, each record containing an issue and at least one pre-existing solution to the issue. A first database includes a plurality of pre-existing solutions and a second database includes a plurality of solutions, each of the plurality of solutions being associated with at least one of the plurality of issues. Notably, the database described in Pretz does not describe nor suggest the use of error proofing, as is known in the art, as a method of eliminating errors in a process, but, rather, Pretz describes a simple question and answer solution that does not provide feedback to a process to eliminate errors, but only serves as a help desk for users with questions. Pretz does not describe nor suggest error-proofing as a manufacturing technique of preventing errors by designing the manufacturing process, equipment, and tools so that an operation literally cannot be performed incorrectly. Thus, for at least the reasons set forth above, Applicants submit that the § 103 rejection is improper and respectfully requests that it be withdrawn.

Claim 1 recites a computer system including "a plurality of clients, each said client comprising a plurality of user interface classes and at least one class that provides access to a database. . . a server comprising a plurality of servlets, at least some of said servlets providing at least one of a database and server access capability to each said client. . . and said database comprising a plurality of tables, at least one of said tables comprising at least one error proofing example entered by a user and meta-data entered by the user that describes the at least one error proofing example, wherein said meta-data comprises at least one of an error stage and an error type, at least one of said tables further comprising at least one failure mode associated with the error proofing example, the error proofing example including at least one failure mode and meta-data defined by the user when creating the at least one error proofing example wherein said database accessed by each said client via said server."

Neither Serbinis nor Pretz, considered alone or in combination, describe or suggest a computer system as is recited in Claim 1. Specifically, neither Serbinis nor Pretz, considered alone or in combination, describe or suggest at least one table that includes at least one error proofing example entered by a user and meta-data entered by the user that describes the at least one error proofing example, wherein the meta-data includes at least one of an error stage and an error type. Rather, Serbinis describes a database with a plurality of tables that

maintain information, such as metadata, on documents stored in a store, and Pretz describes a database including a plurality of records, each record containing an issue and at least one pre-existing solution to the issue. However, neither Serbinis nor Pretz, considered alone or in combination, describe or suggest meta-data that includes at least one of an error stage and an error type.

Moreover, neither Serbinis nor Pretz, considered alone or in combination, describe or suggest at least one table that includes at least one failure mode associated with the error proofing example, and that the error proofing example includes at least one failure mode and meta-data defined by the user when creating the at least one error proofing example. Rather, Serbinis describes a database with a plurality of tables that maintain information, such as metadata, on documents stored in a store, and Pretz describes a database including a plurality of records, each record containing an issue and at least one pre-existing solution to the issue. However, neither Serbinis nor Pretz, considered alone or in combination, describe or suggest that at least one of the tables includes at least one failure mode associated with the error proofing example, wherein the error proofing example includes at least one failure mode and meta-data defined by the user when creating the at least one error proofing example.

For the reasons set forth above, Claim 1 is submitted to be patentable over the Serbinis in view of Pretz.

Claims 2-12 depend from independent Claim 1. When the recitations of Claims 2-12 are considered in combination with the recitations of Claim 1, Applicants submit that dependent Claims 2-12 likewise are patentable over Serbinis in view of Pretz.

Claim 13 recites a method for identifying an error proofing technique for a given application using a web-based computer system, the computer system including a plurality of clients including a plurality of user interface classes, a server including a plurality of servlets, and a database including a plurality of tables including at least one error proofing example entered by a user and user defined meta-data entered by the user to describe the at least one error proofing example, where the at least one error proofing example includes an example of an error proofing technique, the method including the steps of "using at least one interface class to provide access to a database . . . using at least some of the servlets to provide at least one of database and server access capability to a client . . . entering at least one error proofing example by a user and meta-data entered by the user to describe the error-proofing example,

wherein the meta-data includes at least one of an error stage and an error type . . . accessing a table containing at least one of the error proofing examples . . . storing failure modes in the table associated with the at least one error proofing example . . . and choosing the error proofing technique to fit the given application."

Neither Serbinis nor Pretz, considered alone or in combination, describe or suggest a method for identifying an error proofing technique for a given application using a web-based computer system as is recited in Claim 13. Specifically, neither Serbinis nor Pretz, considered alone or in combination, describe or suggest a method that includes entering at least one error proofing example by a user and meta-data entered by the user to describe the error-proofing example, wherein the meta-data includes at least one of an error stage and an error type. Rather, Serbinis describes a database with a plurality of tables that maintain information, such as metadata, on documents stored in a store, and Pretz describes a database including a plurality of records, each record containing an issue and at least one pre-existing solution to the issue. However, neither Serbinis nor Pretz, considered alone or in combination, describe or suggest entering at least one error proofing example by a user and meta-data entered by the user to describe the error-proofing example, wherein the meta-data includes at least one of an error stage and an error type.

Further, neither Serbinis nor Pretz, considered alone or in combination, describe or suggest a method that includes at least one error proofing example that includes an example of an error proofing technique. Rather, Serbinis describes a database with a plurality of tables that maintain information, such as metadata, on documents stored in a store, and Pretz describes a database including a plurality of records, each record containing an issue and at least one pre-existing solution to the issue. However, neither Serbinis nor Pretz, considered alone or in combination, describe or suggest at least one error proofing example that includes an example of an error proofing technique.

Moreover, neither Serbinis nor Pretz, considered alone or in combination, describe or suggest a method that includes the step of storing failure modes in a table associated with the at least one error proofing example. Rather, Serbinis describes a database with a plurality of tables that maintain information, such as metadata, on documents stored in a store, and Pretz describes a database including a plurality of records, each record containing an issue and at least one pre-existing solution to the issue. However, neither Serbinis nor Pretz, considered

alone or in combination, describe or suggest storing failure modes in the table associated with the at least one error proofing example.

Furthermore, neither Serbinis nor Pretz, considered alone or in combination, describe or suggest a method that includes the step of choosing the error proofing technique to fit the given application. Rather, Serbinis describes a database with a plurality of tables that maintain information, such as metadata, on documents stored in a store, and Pretz describes a database including a plurality of records, each record containing an issue and at least one pre-existing solution to the issue. However, neither Serbinis nor Pretz, considered alone or in combination, describe or suggest choosing the error proofing technique to fit the given application.

For the reasons set forth above, Claim 13 is submitted to be patentable over the Serbinis in view of Pretz.

Claims 14-20 depend from independent Claim 13. When the recitations of Claims 14-20 are considered in combination with the recitations of Claim 13, Applicants submit that dependent Claims 14-20 likewise are patentable over Serbinis in view of Pretz.

Moreover, Applicants respectfully submit that the Section 103 rejections of Claims 1-20 are not proper rejections. As is well established, obviousness cannot be established by combining the teachings of the cited art to produce the claimed invention, absent some teaching, suggestion, or incentive supporting the combination. Neither Serbinis nor Pretz, considered alone or in combination, describe nor suggest the claimed combination. Furthermore, in contrast to the assertion within the Office Action, Applicants respectfully submit that it would not be obvious to one skilled in the art to combine Serbinis and Pretz because there is no motivation to combine the references suggested in the cited art itself.

As the Federal Circuit has recognized, obviousness is not established merely by combining references having different individual elements of pending claims. Ex parte Levengood, 28 USPQ2d 1300 (Bd. Pat. App. & Inter. 1993). MPEP 2143.01. Rather, there must be some suggestion, outside of Applicants' disclosure, in the prior art to combine such references, and a reasonable expectation of success must be both found in the prior art, and not based on Applicants' disclosure. In re Vaeck, 20 USPQ2d 1436 (Fed. Cir. 1991). In the

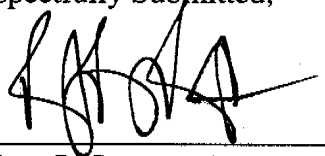
present case, neither a suggestion nor motivation to combine the prior art disclosures, nor any reasonable expectation of success has been shown.

Furthermore, it is impermissible to use the claimed invention as an instruction manual or "template" to piece together the teachings of the cited art so that the claimed invention is rendered obvious. Specifically, one cannot use hindsight reconstruction to pick and choose among isolated disclosures in the art to deprecate the claimed invention. Further, it is impermissible to pick and choose from any one reference only so much of it as will support a given position, to the exclusion of other parts necessary to the full appreciation of what such reference fairly suggests to one of ordinary skill in the art. The present Section 103 rejections are based on a combination of teachings selected from multiple patents in an attempt to arrive at the claimed invention. Specifically, Serbinis teaches a database with a plurality of tables that maintain information, such as metadata, on documents stored in store, and Pretz teaches a database including a plurality of records, each record containing an issue and at least one pre-existing solution to the issue. Since there is no teaching or suggestion in the cited art for the combination, the Section 103 rejections appear to be based on a hindsight reconstruction in which isolated disclosures have been picked and chosen in an attempt to deprecate the present invention. Of course, such a combination is impermissible, and for this reason alone, Applicants request that the Section 103 rejections of Claims 1-20 be withdrawn.

For at least the reasons set forth above, Applicants respectfully request that the rejections of Claims 1-20 under 35 U.S.C. 103(a) be withdrawn.

In view of the foregoing remarks, all the claims now active in this application are believed to be in condition for allowance. Reconsideration and favorable action is respectfully solicited.

Respectfully Submitted,



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